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*Attorneys for Avenue Mortgage, Inc., First Savings Mortgage Corporation,  
Group 2000 Real Estate Services, Inc., and Southern Fidelity Mortgage Corporation*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

LEHMAN BROTHERS HOLDINGS INC., *et al.*

Case No. 08-13555 (SCC)  
(Jointly Administered)

Debtors.

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**JOINDER OF AVENUE MORTGAGE, INC., FIRST SAVINGS MORTGAGE  
CORPORATION, GROUP 2000 REAL ESTATE SERVICES, INC., AND  
SOUTHERN FIDELITY MORTGAGE CORPORATION TO OBJECTION TO MOTION  
TO AMEND AND EXTEND THE SCOPE OF THE ALTERNATIVE DISPUTE  
RESOLUTION PROCEDURES ORDERS FOR INDEMNIFICATION CLAIMS OF THE  
DEBTORS AGAINST MORTGAGE LOAN SELLERS**

Avenue Mortgage, Inc., First Savings Mortgage Corporation, Group 2000 Real Estate  
Services, Inc., and Southern Fidelity Mortgage Corporation (collectively the “Lenders”), by and  
through their undersigned counsel, hereby join in Sections “A” and “B” of the Limited Objection  
of iFreedom Direct Corporation’s Objection [Docket #58916] to the Debtors’ Motion to Amend  
and Extend the Scope of the Alternative Dispute Resolution Procedures Orders for  
Indemnification Claims of the Debtors against Mortgage Loan Sellers (the “Objection”).

Lenders expressly join, adopt, and incorporate by reference the arguments set forth in Sections "A" and "B" of the Objection specifying why the Proposed Order filed by Lehman Brothers Holdings, Inc. [Docket #58858-1] should not be entered by the Court as drafted.

Dated: New York, New York  
October 23, 2018

**BLANK ROME LLP**

By: /s/ Timothy W. Salter  
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TO: William A. Maher  
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STATE OF NEW YORK )

) ss.:

COUNTY OF NEW YORK

Nicola Ross, being duly sworn, deposes and says:

I am over 18 years of age, not a party to this action and am employed at Blank Rome, LLP, 405 Lexington Avenue, New York, NY 10174.

On October 23, 2018, I served a true copy of **JOINDER OF AVENUE MORTGAGE, INC., FIRST SAVINGS MORTGAGE CORPORATION, GROUP 2000 REAL ESTATE SERVICES, INC., AND SOUTHERN FIDELITY MORTGAGE CORPORATION TO OBJECTION TO MOTION TO AMEND AND EXTEND THE SCOPE OF THE ALTERNATIVE DISPUTE RESOLUTION PROCEDURES ORDERS FOR INDEMNIFICATION CLAIMS OF THE DEBTORS AGAINST MORTGAGE LOAN SELLERS** by mail using a postage-paid envelope for that purpose and depositing same with the United States Postal Service upon the following person(s):

William A. Maher  
James N. Lawlor  
Paul R. DeFilippo  
Adam M. Bialek  
Mara R. Lieber  
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101 Park Avenue, 17<sup>th</sup> Floor  
New York, New York 10178

*Nicola Ross*  
Nicola Ross

Sworn to before me this  
23<sup>rd</sup> day of October, 2018

Notary Public

**MICHELE GRANITO**  
**NOTARY PUBLIC, STATE OF NEW YORK**  
 Registration No. 01GR6202734  
 Qualified in RICHMOND County  
 Commission Expires March 23, 2021